REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application.

35 U.S.C. § 103

Claims 1-6 and 8-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Deitel et al. Java How To Program Book, Third Edition, 1999, Pages 7-29, 698-699, 714-717, 876-878, 936-977, 980-998 and 1002-1046 (hereinafter "Deitel") in view of U.S. Patent No. 6,721,713 to Guheen et al. (hereinafter "Guheen-Andersen").

Deitel provides various information regarding developing programs using the Java programming language. Guheen-Andersen discloses "Business Alliance Identification In A Web Architecture Framework". (Guheen-Andersen Title). In particular, Guheen-Andersen discloses the identification of alliances among multiple business entities. A visual coding system is used to show components for which alliances exist. (See Guheen-Andersen Abstract).

Claim 1 of the present application recites:

> An application program interface embodied on one or more computer readable media, comprising:
> a first class to provide information regarding a current HTTP request;
> a second class to manage HTTP output to a client, wherein the second class is further to obtain information regarding capabilities of the client; and
> an object to provide access to server-side utilities and processes.

The Office Action admits (Page 4), "However, Deitel does not specifically mention about obtaining information regarding capabilities of the client." Applicant agrees that Deitel fails to disclose "a second class to manage HTTP output to a client, wherein the second class is further to obtain information regarding capabilities of the client", as recited in claim 1.

The Office Action further states (Page 4), "Guheen-Andersen discloses the well-known concept of obtaining information regarding capabilities of the client (e.g., paragraph 27)." The Examiner has indicated to the Applicant that paragraph 27 of Guheen-Andersen corresponds to column 13, line 66 through column 14, line 20 in the printed patent. That paragraph states:

> Referring again to operation 28 of FIG. 1, and more particularly to FIGS. 18 and FIGS. 27-34, it is seen that FIG. 27 provides an exemplary pictorial representation of various components of a web architecture framework, each component being represented by a box. Three business entities are represented in this example as Business1, Business2, and Business3. Each business entity has a unique indicia coding, as shown in the legend. Indicia coding is provided in each component box that has related products or services offered by a business entity. For example, in the Security Services section, the Browser Based Authentication component has all three types of indicia coding. Thus, all three of the business entities provide products or services related to that component. Also in the Security Services section, the Virtual Private Networks component has only two types of indicia coding. Referring to the legend, it is seen that only Business1 and Business2 offer products or services related to that particular component. For clarity, FIGS. 28, 30, and 32 are provided to illustrate the products or services offered by each individual entity.

First, Applicant submits that there is no motivation to combine the Guheen-Andersen reference with the Deitel reference in rejecting claim 1. Claim 1 is directed toward an application program interface. The preamble of claim 1 states "An application program interface embodied on one or more computer readable

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media, comprising". The above-cited paragraph from the Guheen-Andersen reference discloses a coding system that provides a visual indicia of products or services offered by different businesses. These products or services of different businesses are not related to an application program interface or a class associated with an application program interface. Therefore, the disclosure of Guheen-Andersen is unrelated to the subject matter of claim 1. Accordingly, there would have been no motivation for a person of ordinary skill in the art to have combined Guheen-Andersen with Deitel at the time the invention was made. Thus, the combination of references cited in the Office Action is improper.

Assuming, for the sake of argument, that the combination of Deitel and Guheen-Andersen is proper, Applicant submits that the above-cited paragraph (paragraph 27 of Guheen-Andersen) fails to disclose an application program interface, to which claim 1 of the present application is directed. Further, Applicant submits that the above-cited paragraph of Guheen-Andersen does not disclose "a second <u>class</u> to manage HTTP output to a client, wherein the second <u>class</u> is further to obtain information regarding capabilities of the client" (emphasis added), as recited in claim 1. Since Guheen-Andersen is not associated with an application program interface, there is no reason for the reference to mention classes contained in the application program interface. Thus, Guheen-Andersen fails to disclose or suggest a class of an application program interface that obtains information regarding capabilities of a client. Accordingly, Applicant submits that the Guheen-Andersen reference fails to remedy the deficiencies of the Deitel reference. Thus, Applicant submits that the combination of Deitel and Guheen-Andersen fails to disclose or suggest the elements of claim 1.

As such, applicant submits that claim 1 of the present application is patentable over Deitel in view of Guheen-Andersen. Given that claims 2-6, 8-14, and 32-33 depend from claim 1, applicant respectfully submits that those claims are likewise allowable over Deitel in view of Guheen-Andersen for at least the reasons discussed above.

Claim 15, as amended, recites:

An application program interface embodied on one or more computer readable media, comprising:
a first group of services related to information associated with a current HTTP request;
a second group of services related to managing HTTP output to a client, wherein the second group of services is further related to obtaining information regarding capabilities of a browser application running on the client;
a third group of services related to accessing server-based utilities; and
a fourth group of services related to creating web services.

The Office Action admits (Page 6), "However, Deitel does not specifically mention about services related to obtaining information regarding capabilities of a browser application running on the client...." Applicant agrees that Deitel fails to disclose "a second group of services related to managing HTTP output to a client, wherein the second group of services is further related to obtaining information regarding capabilities of a browser application running on the client", as recited in claim 15.

The Office Action further states (Page 6), "Guheen-Andersen discloses the well-known concept of services related to obtaining information regarding

capabilities of a browser application running on the client (e.g., paragraph 27)." As discussed above with respect to claim 1, the Examiner has indicated that paragraph 27 of Guheen-Andersen corresponds to column 13, line 66 through column 14, line 20. That paragraph is discussed above with respect to claim 1.

As discussed above, Applicant submits that there is no motivation to combine the Guheen-Andersen reference with the Deitel reference in rejecting claim 15. Claim 15 is directed toward an application program interface. The preamble of claim 15 states "An application program interface embodied on one or more computer readable media, comprising". The above-cited paragraph from the Guheen-Andersen reference discloses a coding system that provides a visual indicia of products or services offered by different businesses. These products or services of different businesses are not related to an application program interface or a group of services associated with an application program interface. Therefore, the disclosure of Guheen-Andersen is unrelated to the subject matter of claim 15. Accordingly, there would have been no motivation for a person of ordinary skill in the art to have combined Guheen-Andersen with Deitel at the time the invention was made. Thus, the combination of references cited in the Office Action is improper.

Assuming, for the sake of argument, that the combination of Deitel and Guheen-Andersen is proper, Applicant submits that the above-cited paragraph (paragraph 27 of Guheen-Andersen) fails to disclose an application program interface, to which claim 15 of the present application is directed. Further, Applicant submits that the above-cited paragraph of Guheen-Andersen does not disclose "a second group of services related to managing HTTP output to a client,

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wherein the second group of services is further related to obtaining information regarding capabilities of a browser application running on the client", as recited in claim 15. Since Guheen-Andersen is not associated with an application program interface, there is no reason for the reference to mention services associated with the application program interface. Thus, Guheen-Andersen fails to disclose or suggest a group of services in an application program interface that obtains information regarding capabilities of a browser application running on the client. Accordingly, Applicant submits that the Guheen-Andersen reference fails to remedy the deficiencies of the Deitel reference. Thus, Applicant submits that the combination of Deitel and Guheen-Andersen fails to disclose or suggest the elements of claim 15.

As such, applicant submits that claim 15 of the present application is patentable over Deitel in view of Guheen-Andersen. Given that claims 16-21 depend from claim 15, applicant respectfully submits that those claims are likewise allowable over Deitel in view of Guheen-Andersen for at least the reasons discussed above.

Claim 22, as amended, recites:

A method of creating an application program interface", the method comprising:

creating an HTTP request class to provide information regarding a current HTTP request;

creating an HTTP response class to manage an HTTP output stream to a client, wherein the HTTP response class is further to manage information regarding capabilities of the client; and

creating an HTTP server utility object to provide access to server-based utilities.

The Office Action admits (Page 6), "However, Deitel does not specifically mention about services ... to manage information regarding capabilities of the client". Applicant agrees that Deitel fails to disclose "creating an HTTP response class to manage an HTTP output stream to a client, wherein the HTTP response class is further to manage information regarding capabilities of the client", as recited in claim 22.

As mentioned above, the Office Action relies on the Guheen-Andersen reference to correct the deficiencies of Deitel. Applicant submits that there is no motivation to combine the Guheen-Andersen reference with the Deitel reference in rejecting claim 22. Claim 22, as amended, is directed toward creating an application program interface. The preamble of claim 22 states "A method of creating an application program interface, the method comprising". The Guheen-Andersen reference discloses a coding system that provides a visual indicia of products or services offered by different businesses. These products or services of different businesses are not related to creating an <u>application program interface</u> or <u>classes</u> associated with an application program interface. Therefore, the disclosure of Guheen-Andersen is unrelated to the subject matter of claim 22. Accordingly, there would have been no motivation for a person of ordinary skill in the art to have combined Guheen-Andersen with Deitel at the time the invention was made. Thus, the combination of references cited in the Office Action is improper.

Assuming, for the sake of argument, that the combination of Deitel and Guheen-Andersen is proper, Applicant submits that Guheen-Andersen fails to disclose an application program interface, to which claim 22 of the present application is directed. Further, Applicant submits that Guheen-Andersen does not

disclose "creating an HTTP response class to manage an HTTP output stream to a client, wherein the HTTP response class is further to manage information regarding capabilities of the client", as recited in claim 22. Since Guheen-Andersen is not associated with creating an application program interface, there is no reason for the reference to mention the creation of classes associated with the application program interface. Thus, Guheen-Andersen fails to disclose or suggest a class in an application program interface that manages information regarding capabilities of the client. Accordingly, Applicant submits that the Guheen-Andersen reference fails to remedy the deficiencies of the Deitel reference. Thus, Applicant submits that the combination of Deitel and Guheen-Andersen fails to disclose or suggest the elements of claim 22.

As such, applicant submits that claim 22 of the present application is patentable over Deitel in view of Guheen-Andersen. Given that claims 23-26 depend from claim 22, applicant respectfully submits that those claims are likewise allowable over Deitel in view of Guheen-Andersen for at least the reasons discussed above.

Claim 27, as amended, recites:

A computer system including one or more microprocessors and one or more software programs, the one or more software programs utilizing an application program interface to request services from an operating system, the application program interface including separate commands to request services consisting of the following groups of services:
a first group of services related to information regarding a current HTTP request;
a second group of services related to managing HTTP output to a client, wherein the second group of services is further related to obtaining information regarding capabilities of a web browser running on the client;

a third group of services related to providing access to server-based utilities;

a fourth group of services related to creating web services;

a fifth group of services related to sharing global information across multiple sessions associated with an application;

a sixth group of services related to caching frequently used resources; and

a seventh group of services related to obtaining information regarding a platform type associated with the client.

Applicant submits that neither Deitel nor Guheen-Andersen, alone or in any proper combination, disclose the various groups of services recited in amended claim 27. As such, applicant submits that claim 27 of the present application is patentable over Deitel in view of Guheen-Andersen.

Claim 28 of the present application recites:

A method comprising:

calling one or more first functions to facilitate providing information related to a current HTTP request;

calling one or more second functions to facilitate managing HTTP output to a client, wherein the one or more second functions are further to manage a plurality of cookies associated with a particular web application;

calling one or more third functions to facilitate access to server-based utilities and processes; and

calling one or more fourth functions to facilitate creating a user interface on a web page.

The Office Action admits (Page 6), "However, Deitel does not specifically mention about services ... to manage a plurality of cookies associated with a particular web application". Applicant agrees that Deitel fails to disclose "calling one or more second functions to facilitate managing HTTP output to a client,

wherein the one or more second functions are further to manage a plurality of cookies associated with a particular web application", as recited in claim 28.

As mentioned above, the Office Action relies on the Guheen-Andersen reference to correct the deficiencies of Deitel. Applicant submits that there is no motivation to combine the Guheen-Andersen reference with the Deitel reference in rejecting claim 28. Claim 28 is directed toward calling functions regarding various HTTP operations, server utilities and processes, and functions to create a user interface on a web page. In contrast, the Guheen-Andersen reference discloses a coding system that provides a visual indicia of products or services offered by different businesses. These products or services of different businesses are not related to the various functions recited in claim 28. Therefore, the disclosure of Guheen-Andersen is unrelated to the subject matter of claim 28. Accordingly, there would have been no motivation for a person of ordinary skill in the art to have combined Guheen-Andersen with Deitel at the time the invention was made. Thus, the combination of references cited in the Office Action is improper.

Assuming, for the sake of argument, that the combination of Deitel and Guheen-Andersen is proper, Applicant submits that Guheen-Andersen fails to disclose "calling one or more second functions to facilitate managing HTTP output to a client, wherein the one or more second functions are further to manage a plurality of cookies associated with a particular web application", as recited in claim 28. First, Guheen-Andersen is not associated with managing HTTP output to a client. Second, the Guheen-Anderson reference does not mention the use of cookies associated with a <u>particular web application</u>. Thus, Applicant submits that

the Guheen-Andersen reference fails to remedy the deficiencies of the Deitel reference. Accordingly, Applicant submits that the combination of Deitel and Guheen-Andersen fails to disclose or suggest the elements of claim 28.

As such, applicant submits that claim 28 of the present application is patentable over Deitel in view of Guheen-Andersen. Given that claims 29-31 depend from claim 28, applicant respectfully submits that those claims are likewise allowable over Deitel in view of Guheen-Andersen for at least the reasons discussed above.

Claim 7 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Deitel and Guheen-Andersen in view of "Official Notice". Applicant respectfully submits that claim 7 is patentable over Deitel and Guheen-Andersen in view of "Official Notice".

The Office Action takes Official Notice "that both the concept and advantages of providing a base class for web services is well known and expected in the art". (Office Action, Page 9). As discussed above with respect to claim 1 (from which claim 7 depends), Deitel fails to disclose "a second class to manage HTTP output to a client, wherein the second class is further to obtain information regarding capabilities of the client". As further discussed above, the Guheen-Andersen reference fails to remedy the deficiencies of the Deitel reference with respect to claim 1. Additionally, the Office Action's "Official Notice" fails to disclose this missing element of claim 1. Further, nothing in Deitel nor Guheen-Andersen, alone or in any proper combination, suggests a class to manage HTTP output from a client and obtain information regarding capabilities of the client.

Since claim 7 depends from claim 1, Applicant submits that claim 7 is allowable over Deitel and Guheen-Andersen in view of "Official Notice".
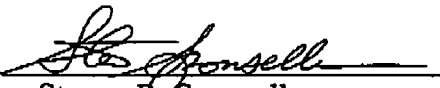
Applicant respectfully requests that the §103 rejections be withdrawn.

Conclusion

Claims 1-33 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

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